

## REMARKS

In the above-referenced application, claims 1-9, 16, 17, 19, 20, 29, and 30 are currently pending. Of those claims, claims 8, 16 and 19 have been withdrawn from consideration and claims 1-7, 9, 17, 20, 29, and 30 are rejected as obvious over Clark in view of Leuchten et al. By way of this amendment, claims 1 and 30 have been amended and the applicants submit the following arguments for consideration by the examiner. Reconsideration and allowance of the claims in light of these arguments is respectfully solicited.

Of the rejected claims, claims 1 and 30 are independent and both specify, *inter alia*, a door comprising a resilient core, a flexible covering, and an actuation system wherein a panel of the door is able to recover a relaxed shape after an impact causes the panel to deform out of co-planar alignment<sup>1</sup>. The applicants respectfully submit that neither Clark nor Leuchten et al. disclose such elements, and in fact, it is counter-intuitive to think their combination would result in the subject matter of the pending claims.

As has been argued throughout prosecution, Clark simply discloses a solid, steel door assembly having first and second inflexible panels which are laterally moveable relative to the door. As admitted by the examiner, the door panels of Clark are not resilient or flexible, but rather are stiff and rigid. Thus, Clark fails to satisfy the resilient and flexible elements of the pending claims. For this deficiency, the examiner has looked to the teachings of the Leuchten et al. reference. However, applicants respectfully submit that it too fails to disclose a resilient core having a flexible covering at least partially covering the resilient core, much less one wherein

---

<sup>1</sup> Support for the co-planar alignment limitation can be found in the specification at, e.g., page 12, first paragraph.

the door panel formed by the core and covering is able to recover its relaxed shape after being deformed out of co-planar alignment. To the converse, actually, Leuchten et al. is directed to the production of an automotive door panel having reinforcement and impact absorbing properties with improved resistance to buckling and bending. Put another way, the door panel of Leuchten et al. is directed to a reinforced construction which enables the panel to absorb a significant impact without deforming. Clearly, the combination of a solid, steel door (Clark) with a reinforcement structure (Leuchten et al.) would not result in door adapted to regain its shape after deformation as claimed.

These arguments find support in the clear focus of the Leuchten et al. reference, as it is replete with citations to its "reinforcement" capability. For example, starting with the very cover page of Leuchten et al., both the title and abstract repeat **reinforcement** as its purpose. The title reads: "Honeycomb **Reinforcing** Sheet for the **Reinforcement** of Panels and Method of **Reinforcing** Panels." The abstract states that its "**reinforcing** sheet provides excellent flexural **reinforcement** and impact absorbing properties and is advantageously used to **reinforce** cold rolled steel, such as an automobile panel."

Moving on into the specification of the Leuchten reference, column 1, line 12 states "the invention relates to a **reinforcing** sheet providing improved flexural strength and impact resistance for a cold rolled steel panel, such as an automobile panel, and to a method for **reinforcing** a cold rolled steel panel using such a reinforcing sheet." That same column, at lines 20-29, states that the automotive industry is confronted with the opposed design constraints of manufacturing door panels of sufficient strength, but at reduced thickness and weight. This is obviously problematic in that, in line 26, Leuchten states "insufficiently rigid outer panels

buckle and bend with minimum applied stress. In addition, thin outer panels exhibit poor impact absorbing properties.” Clearly, Leuchten at this point is suggesting that buckling and bending are undesirable properties which are to be avoided, and that reinforcement is the answer, the exact opposite of what is disclosed and suggested as being advantageous in the pending application.

Additionally, and importantly, in the objects of the invention section of the Leuchten et al. reference, wherein it attempts to set forth the advantages garnered by its teachings, it states that it is an object of its invention “to provide such a **reinforcing** sheet containing a honeycomb member for the **reinforcement** of a panel, which sheet is sufficiently flexible to conform to the shape of the panel to be **reinforced**.”<sup>2</sup> The objects of the invention further state that it is an object of its invention to “provide a **reinforced** panel which exhibits improved resistance to impact, buckling and bending compared to an unreinforced panel or a panel **reinforced** by a conventional **reinforcing** sheet without a honeycomb member.” Here, applicants submit that Leuchten et al. could not be more clear in its contention that buckling and bending of its panel upon impact is a negative or detrimental aspect to be avoided. Again, this is in direct contrast to the teachings of the pending application, wherein the doors are advantageously deformable and resilient upon impact.

None of the above should be surprising in that the present disclosure and Leuchten et al. reference are directed to accomplishing quite contrary objectives. As stated above, the focus of the Leuchten et al. reference is to provide a reinforced

---

<sup>2</sup> It is important to note that the “sufficiently flexible to conform” language of Leuchten et al. is referring to the ability of the honeycomb to deflect during manufacture and installation onto a curved door panel. However, once installed and hardened, the honeycomb clearly serves a reinforcing role.

door panel which is able to absorb a significant impact without buckling or bending. This is important not only to maintain the shape of the automobile from a structural and aesthetic standpoint, but more importantly, to prevent the forces stemming from the impact from being transmitted to the occupants of the automobile.

The pending application on the other hand, is directed to a cold storage door which laterally slides upon rails. Given the working environment of such doors, they are often subjected to significant lateral forces, e.g., collisions with loading vehicles and fork lifts. If the doors were manufactured from rigid and reinforced materials such as those disclosed in Clark and Leuchten et al., the door itself would be permanently deformed or the rail upon which the door slides would be permanently deformed so as to not slide back and forth in the desired tolerances. Not only does this effect the potential operability of the door, but more commonly, effects the sealing capability of the door in that once the door or the rails are deformed, the seals surrounding the doors are necessarily effected in a detrimental fashion. Accordingly, by manufacturing the doors from resilient, flexible materials which are able to regain their natural shape after an impact distorts the door out of co-planar alignment, not only is the door able to maintain its proper shape, but the rails upon which the door laterally traverses are not detrimentally effected and thus the seals provided by the door are maintained.

In light of the above, the applicants respectfully submit that the flexible covering, and recovering of a relaxed shape after deformation out of co-planar alignment limitations of the pending claims are not met by a first reference disclosing a solid steel door and a second reference disclosing reinforcement structure. To hold otherwise is non-sensical.

In light of the foregoing, applicants respectfully submit that the obviousness rejection of the pending claims in light of Clark in view of Leuchten et al. should be withdrawn. Applicants further submit that no new matter requiring additional search has been submitted herewith and that thus this Amendment After Final is properly considerable by the examiner. Should the examiner have any questions, he is respectfully invited to telephone the undersigned.

Dated: March 31, 2004

Respectfully submitted,

By:

  
Thomas A. Miller

Registration No. 40,091

MARSHALL, GERSTEIN & BORUN

233 S. Wacker Drive

6300 Sears Tower

Chicago, Illinois 60606-6357

(312) 474-6300

Attorneys for Applicant